EB DOCKET NO. 06-36

February 3, 2006

Ms. Marlene H. Dortch Secretary Federal Communications Commission 445 12th Street SW Washington, DC 20554

Reference: EB-06-TC-060, Certification of CPNI Filing of Blackfoot Communications, Inc.

Dear Ms. Dortch:

Enclosed is the CPNI compliance certificate of Blackfoot Communications, Inc. (499 Filer ID 818046) in response to the Public Notice issued by the Federal Communication Commission's Enforcement Bureau on January 30, 2006. The Enforcement Bureau has requested the compliance certificate as required by section 64.2009(e) of the Commission's rules.

Please contact me with any questions or concerns.

Sincerely,

Michelle Wheeler

Carrier and Regulatory Specialist

Michelle Wheeler

Phone: 406-541-5131

E-mail: mwheeler@blackfoot.com

cc: Byron McCoy, byron.mccoy@fcc.gov

Best Copy and Printing, Inc. (BCPI), fcc@bcpiweb.com

Blackfoot Communications, Inc. CPNI Certification and Statement

Before the Federal Communications Commission Washington, D.C. 20554

CPNI Compliance Certification)	EB-06-TC-060, EB Docket No. 06-36
As Required by FCC Enforcement)	Blackfoot Communications, Inc.
Bureau, DA 06-223)	499 Filer ID 818046

BLACKFOOT COMMUNICATIONS, INC. CERTIFICATION OF CPNI FILING (February 3, 2006)

- 1. Blackfoot Communications, Inc. ("BCI") (499 Filer ID 818046) is submitting this compliance certificate in response to the Public Notice issued by the FCC's Enforcement Bureau on January 30, 2006 (DA 06-223), pursuant to section 64.2009(e) of the Federal Communication Commission's rules.
- 2. I am the Senior Vice President and General Counsel, for BCI. I make this certification from my personal knowledge of the CPNI procedures and policies of BCI.
- 3. BCI expects to use CPNI for marketing purposes and has recently noticed customers under the "opt-out" provisions of the rules. BCI's use of CPNI is and will be done in strict compliance with the principles and requirements outlined in Subtitle U of the Commission's rules. Accordingly, BCI's personnel are trained in the proper use of CPNI for such purposes. Because CPNI will be used for marketing purposes, BCI has established the appropriate safeguards for this type of use of CPNI data. These safeguards include documentation of this policy in company procedures and training of company personnel with regard to use of CPNI data.
- 3. On behalf of BCI, I certify that, pursuant to the Commission's rules, BCI has established procedures that are adequate to ensure compliance with CPNI rules currently in effect and the statements contained in this filing are correct.

William Squires

Senior Vice President and General Counsel

Blackfoot Communications, Inc. CPNI Certification and Statement

Before the Federal Communications Commission Washington, D.C. 20554

CPNI Compliance Certification)	EB-06-TC-060, EB Docket No. 06-36
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BLACKFOOT COMMUNICATIONS, INC. CERTIFICATION OF CPNI FILING (February 3, 2006)

OPERATING PROCEDURES STATEMENT

- 1. Customer account prominently displays "CPNI" so that Customer Sales and Service Representatives (CSSRs) can readily identify customers opting to restrict use of their CPNI. When calls are received by CSSRs from customers with this preferred treatment they ask for customer permission to access account information.
- 2. Customers are given an opportunity to "opt-out" of CPNI usage beginning with the install of service. Additionally, customers may "opt-out" at any time.
- 3. Notice regarding customer CPNI rights and BCI's duty to protect CPNI is provided to all new and existing customers in the printed telephone directory. In addition, the notice is also printed once every two years as a message on the customer's billing statement.
- 4. Employees are trained on the proper use and/or disclosure of CPNI. Additionally procedures are documented and readily available to all employees on the company's internal website.
- 5. Access to CPNI data is limited to employees and/or entities with proper authorization as allowed under Commission rules. All employees and/or entities with such access operate under policies and/or contract requiring nondisclosure of confidential information.
- 6. All marketing campaigns and materials are reviewed by a supervisory panel. This will include any use of CPNI data used in any given marketing effort. Please note that as of this time BCI has not used CPNI data in this manner but the proper safeguards are in place should it be used.
- 7. Improper use or disclosure of CPNI is subject to BCI's work rules and disciplinary policies as outlined in its policy manual. The policy manual is readily accessible by all employees.

Blackfoot Communications, Inc. CPNI Certification and Statement